

**REMARKS**

Claims 1-12,14, 16-26 are pending in this application

Claim Rejections under 35 U.S.C. 101

Claims 21 and 22 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Claims 21 and 22 have been amended to recite that investment criteria are entered into a computer system in which trading interests of a plurality of parties are stored. Accordingly, withdrawal of the rejection under 35 U.S.C. 101 is respectfully requested.

Claim Rejections under 35 U.S.C. 112

Claims 22 and 23 were rejected under 35 U.S.C. §112 as being indefinite. The Examiner has asserted that it is unclear to whom or to what the investment criteria is entered. Claims 22 and 23 have been amended to recite that investment criteria are entered into a computer system in which trading interests of a plurality of parties are stored. Accordingly, withdrawal of the rejection under 35 U.S.C. 112 is respectfully requested.

Claim Rejections under 35 U.S.C. 102(b)/103(a)

Claims 1-26 were rejected under 35 U.S.C. 102(b) as anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious from the Bloomberg Financial Markets Commodity News reference (the "BOOM reference"). According to the Examiner, the reference includes a screen shot of commercial paper issued by SLM having a maturity date of 12/8/99. The Examiner pointed out that the date of the BOOM reference is unclear. As stated in the Response to the Request for Information below, the exact date on which the Bloomberg Financial Markets Commodities News reference was first

publicly displayed cannot be readily obtained. It appears that the Examiner assumed that the BOOM reference was publicly displayed as early as on December 8, 1999. It further appears that, in issuing the 102(b)/103(a) rejections, the Examiner also assumed that the BOOM reference predates the *effective* filing date of the present application by more than a year. However, the present application claims priority under 35 U.S.C. §119(e) of Provisional Patent Application No. 60/229,173, filed August 30, 2000 (“the ‘173 Application”). See Preliminary Amendment dated May 8, 2001, at 1.

It is submitted that support for the pending claims may be found in the ‘173 Application as follows:

for claims 1-8, 12, 14, 16, 17, 21-23, *see* page 1, lines 16-21; page 2, lines 23-29; page 10, lines 19-20; page 13, lines 12-13; page 23, lines 4-26; page 27, lines 7-9; Figs. 1-2, 16a-16c, and 22 of the ‘173 Application;

for claims 9, 11, 18, 20, and 24, *see* page 3, lines 29-30; page 16, lines 22-27; page 17, lines 27-28; page 18, lines 22-27; Fig. 11; and Appendix, pages 31, 35, 38, 39, to the ‘173 Application; and

claims 10, 19, 25, and 26, *see* page 14, line 28 to page 18, line 21; Figs. 3-10 of the ‘173 Application.

Therefore, the BOOM reference should not be considered 102(b)/103(a) prior art with respect to the pending claims, and withdrawal of the rejections of the pending claims under 35 U.S.C. 102(b)/103(a) is respectfully requested.

**RESPONSE TO REQUEST FOR INFORMATION UNDER 37 CFR 1.105**

In response to the request for information in the March 8, 2005 Office Action, the following information is provided. As presently advised, the screen shot of commercial paper issued by SLM having a maturity date of 12/8/99 included in the Bloomberg Financial Markets Commodities News reference represents historical information. Therefore, it would appear that the screen shot was taken on 12/7/99, as there is only one day remaining to maturity of the SLM commercial paper. However, as also presently advised: the Bloomberg Offering on Money Market (BOOM) system was tested starting in September 1999 and then entered non-experimental use; a public announcement regarding the availability of the BOOM system on the BLOOMBERG PROFESSIONAL® Service (BPS) was displayed on the BPS at least as early as January 7, 2000; the exact date on which the BOOM system entered non-experimental use cannot be readily obtained; and the exact date on which the Bloomberg Financial Markets Commodities News reference was first publicly displayed cannot be readily obtained.

**CONCLUSION**

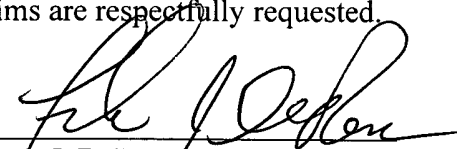
It is submitted that the pending claims are allowable. Reconsideration and allowance of the application with the pending claims are respectfully requested.

Dated: September 7, 2005

I hereby certify that the correspondence attached herewith is being transmitted by first class mail to Mail Stop: Amendments, Commissioner for Patents, Box 1450, Alexandria, VA 22313-1450:

  
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